

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NORMA KNOPF, individually and as
a Distributee and the Executor Named
in Michael Knopf's Last Will,

Plaintiff,

- against -

FRANK M. ESPOSITO,
DORSEY & WHITNEY, LLP,
NATHANIEL H. AKERMAN,
and EDWARD S. FELDMAN,

Defendants.
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Case No. 17 Civ. 5833 (DLC) (SN)

Hon. Denise L. Cote, U.S.D.J.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Declaration of Eric W. Berry and accompanying Memorandum of Law, both dated June 9, 2021, plaintiff Norma Knopf will move before this Court, the Hon. Denise L. Cote, U.S.D.J., presiding, at the Sen. Daniel Patrick Moynihan Courthouse, 500 Pearl Street, Courtroom 15B, New York, New York 10007, at a date and time to be determined by the Court, for an order

(1) pursuant to Local Rule 6.3 and Federal Rules of Civil Procedure 59(e), 54(b) and 60(b)(1) granting reconsideration of the portion of the Court's May 26, 2021 decision (ECF 450) ("the Decision") that imposed a cap on Mrs. Knopfs' possible damages; and

(2) upon reconsideration, increasing the cap on Mrs. Knopfs' possible damages by the \$650,000 amount by which the Decision reduced those damages for reasons relating to a January 6, 2015 mortgage granted by Pursuit Holdings, LLC in favor of Meister Seelig & Fein, LLP.

Denise L. Cote
Denise L. Cote
6/11/21

Dated: New York, New York
June 9, 2021

Berry Law PLLC
/s/ Eric W. Berry

By: _____
Eric W. Berry [EB8598]
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/s/Gary Greenberg

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To: all counsel and *pro se* parties (by the ECF system)